

UNITED STATES DISTRICT COURT

SOUTHERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

Chandos M. Daniels

CRIMINAL COMPLAINT

Case Number:

H14-628 MJ

(Name and Address of Defendant)

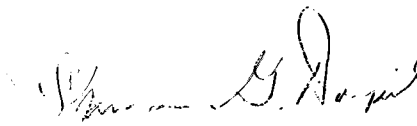
I, the undersigned complainant, state that the following is true and correct to the best of my knowledge and belief. On or about June 21, 2014 in Harris County, in the Southern District of Texas defendant(s) did,

(Track Statutory Language of Offense)

knowingly recruit, entice, harbor, transport, provide, obtain, or maintain a person, knowing and in reckless disregard of the fact that means of force, fraud, or coercion or that the person had not attained the age of 18 years and would be caused to engage in a commercial sex act.

in violation of Title 18 United States Code, Section(s) 1591(a)(1)(2).

I further state that I am a(n) Special Agent and that this complaint is based on the facts related in the affidavit attached hereto and made a part of this complaint.



Signature of Complainant

Shanna G. Daniels

Printed Name of Complainant

Sworn to before me and signed in my presence,

Date June 23, 2014at Houston, TX

City and State

Mary Milloy, U.S. Magistrate Judge

Name and Title of Judicial Officer

Signature of Judicial Officer

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Shanna G. Daniels, being duly sworn, depose and state:

1. I am currently employed as a Special Agent with the Federal Bureau of Investigation (FBI), and have been so employed since July 10, 2005. I am currently assigned to the FBI's Houston Division, located in Houston, Texas. My current assignment consists of investigating crimes involving the sex trafficking of children as a member of the Houston Child Exploitation Task Force (HCETF). I have been assigned to the HCETF since December 2013, and am actively involved in investigating multiple cases relating to the sex trafficking of children. As a member of the HCETF, I have had the opportunity to observe and review case examples relating to the sex trafficking of children, and have participated in the execution of operations targeting those individuals actively engaged in violations of Title 18 U.S.C., §1591(a)(1)(2), defined as Sex Trafficking of children by force, fraud or coercion. I have spoken with officers and investigators within my own, and other law enforcement agencies, who have participated in obtaining and executing more than 75 search warrants related to the sexual exploitation of children, and are knowledgeable regarding the methods and means used by individuals who engage in criminal activities such as prostitution, child prostitution, and child sex trafficking. Conversations with these officers and investigators have provided your Affiant with insight as to the manner in which evidence of these crimes are kept.

2. Sex trafficking of children, as defined in 18 U.S.C. § 1591 (a), is:

(a) Whoever knowingly—

(1) in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States, recruits, entices, harbors, transports, provides, obtains, or maintains by any means a person; or

(2) benefits, financially or by receiving anything of value, from participation in a venture which has engaged in an act described in violation of paragraph (1),

knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion described in subsection (e)(2), or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be caused to engage in a commercial sex act, shall be punished as provided in subsection (b).

3. This Affidavit is made in support of a criminal complaint charging CHANDOS M.

DANIELS, with violating 18 U.S.C. § 1591(a)(1) and (2), which makes it a crime to traffic children for the purpose of sex.

4. I am familiar with the information contained in this Affidavit based upon investigation I have personally conducted, and, upon my conversations with other law enforcement officers also involved in this investigation.

5. Because this Affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause that evidence of an ongoing violation of 18 U.S.C. § 1591(a)(1)(2) was committed by DANIELS on or about June 21, 2014. Where statements of others are set forth in this Affidavit, they are set forth in substance and in part.

6. On Saturday, June 21, 2014, Houston Police Department (HPD) Child Exploitation Task Force Officer Donald R. Miller, utilized an internet connected computer at the FBI field

office located at 1 Justice Park Dr., Houston, TX 77092, to identify an advertisement for sexual services posted under the escort section of the website Backpage.com. Your Affiant knows that Backpage.com is a centralized network of online communities, featuring online classified advertisements with sections devoted to jobs, housing, personals, and for sale services. Backpage.com also has an “erotic services” section that is used by individuals promoting prostitution to advertise the sexual services of their prostitutes for the express purpose of establishing “dates” with individuals who wish to pay for sexual acts. Advertisements posted on Backpage.com generally provide pictures of escorts posed in sexually provocative positions, a description of the sexual services the prostitute is willing to engage in, along with a telephone number where the prostitute can be reached. Based upon your Affiant’s knowledge and experience with reviewing escort advertisements located on Backpage.com, the names and photographs associated with a Backpage.com advertisement do not always accurately correspond with the individual encountered at the time a “date” is made. The Backpage.com advertisement identified by Officer Miller is associated with the Backpage.com Post ID: 22434064. The advertisement contained multiple photographs of a female posed in various sexually explicit positions, and offered customers the sexual services of a prostitute named “Crystal,” located in Houston, TX near Hwy 290 and 43rd Street, who could be reached via telephone number (310) 299-6658.

7. At approximately 4:31 pm, Officer Miller contacted the number listed on the Backpage.com advertisement and spoke to a female who identified herself as “Crystal.” “Crystal” asked Officer Miller how much time he wanted to spend with her. She indicated that her fee for half an hour was one hundred dollars, and the fee for an entire

hour was two hundred dollars. Officer Miller established a "date" to meet "Crystal" for a half hour "in-call" prostitution service. Based upon my knowledge and experience, your Affiant knows that an "in-call" prostitution service is defined as the customer traveling to a destination specified by the prostitute to engage in commercial sex. "Crystal" advised she would text Officer Miller her address, and at approximately 4:33 pm Officer Miller received a text message from "Crystal" containing the address of the Americas Best Value Inn and Suites located at 12170 Northwest Fwy., Houston, TX 77092. The Americas Best Value Inn and Suites is described as a two story building that is tan in color and is located on the east side of the Northwest Freeway Service road, North of the intersection of Northwest Freeway and 43rd Street, and South of the intersection of Northwest Freeway and Bingle.

8. After receiving the address location, prior to the arrival of Officer Miller, Officers and Agents from FBI Houston's Child Exploitation task force established static surveillance in the vicinity of the Americas Best Value Inn and Suites. Your Affiant and Special Agent (SA) Sherri Rice set up on the NE side of the motel, with a view of the area outside a bank of rooms which included room 108. At approximately 5:15 p.m., SA Rice and your Affiant observed a black male, subsequently identified as CHANDOS DANIELS, dressed in a white tank top and grey pants; park a 2006 white Chrysler PT Cruiser in a parking spot directly in front of room 108. After exiting the vehicle, the Black male was observed entering room 108 carrying what appeared to be a Styrofoam takeout food container. The Black male remained inside room 108 for approximately 3-4 minutes prior to returning to the vehicle. After returning to the vehicle, the Black male pulled out of the parking spot in front of room 108, and was observed by other Officers

and Agents driving to the opposite side of the Americas Best Value Inn and Suites where he parked the vehicle in another parking spot and again exited the vehicle. The license plate of the PT Cruiser was observed to be a Texas tag bearing the plate number CST7304. Registration information pertaining to the license plate determined that the vehicle was registered to Denise Brunner, address 3706 Tecovas Springs Court, Killeen, TX 76549. Subsequent investigation revealed Denise Brunner to be the mother of the minor female referenced hereafter. Brunner was contacted via telephone by Special Agent Nicole Dunn, and provided verbal consent for agents to conduct a search of the aforementioned vehicle. Search of the vehicle resulted in the discovery of evidence known by your Affiant to be indicative of involvement in criminal activities related to human sex trafficking, including but not limited to; multiple unused Trojan brand condoms, the same brand as those ultimately found being used to perform prostitution services inside room 108, an additional cellular phone, Two thousand eight hundred fifty dollars in cash located in the pocket of a white pair of sweat pants, KY warming jelly, 5 America's Best Value Inn and Suites key cards, 4 Scottish Inn Room key cards, multiple Walgreens receipts for Vanilla pre-paid visa gift cards.

9. After arriving at the Americas Best Value Inn, Officer Miller re-contacted "Crystal" and was provided with the room number 108. At approximately 5:20 PM, Officer Miller entered room 108 and developed probable cause to arrest the occupant, subsequently identified as 17 year old T.B., Date of Birth: XX/XX/1996, for solicitation of prostitution after she agreed to perform straight sex allowing multiple ejaculations for a fee of two hundred dollars. After obtaining the elements necessary to establish a prostitution charge, Officer Miller identified himself as the police, and observed in plain view a

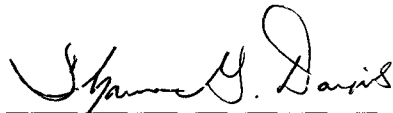
cellular telephone in the open position containing a text message sent to telephone number (832) 466-3353. The text message stated "He is going to stay." At or about the same time CETF members were affecting the arrest of TB, HPD Officer David Nieto and your Affiant went to the front desk of the Americas Best Value Inn and Suites to obtain records regarding the registrant of room 108. Upon entering the motel lobby, Officer Nieto and your Affiant encountered a black male wearing a tank top and grey sweatpants fitting the description of the black male seen earlier driving the PT Cruiser and entering/exiting room 108. When asked to provide registrant information for room 108, the hotel clerk observed the black male who was attempting to make his way towards the lobby exit, and identified him (the black male) as the registrant for room 108. Officer Nieto and your Affiant immediately detained the black male, who initially attempted to provide false information regarding the room he was associated with, however, upon further inquiry, subsequently confirmed he was the registrant for room 108. The clerk provided Officer Nieto with a printed room record containing a driver's license photo of CHANDOS DANIELS, Date of Birth: XX/XX/1987, with an address in St. Robert, MO 65584, who matched the description of the detained individual. At such time, DANIELS was placed under arrest based on the Affiant's and Officer Nieto's probable cause to believe that DANIELS was involved in the Sex Trafficking of a Minor.

10. At the time of his arrest, DANIELS was immediately searched for the purposes of officer safety, and was found to be in possession of approximately \$651 dollars in cash, and an Apple Iphone. Based on your Affiant's training, and the knowledge, experience, and training of other law enforcement officers, I know that Computers and Smartphone Cellular telephones are often essential tools for facilitating online prostitution activity.

This includes the online posting of advertisements containing photographs of juveniles and other victims in sexually explicit poses while wearing provocative clothing. Many cellular telephones not only have camera features which allow the phone to take photographs, they also have the capability of uploading the photographs to Internet websites such as Backpage.com, where advertisements can be posted offering sexual or "escort" type services. In addition to being utilized for posting advertisements, cellular telephones belonging to pimps and prostitutes often contain information ranging from contact names and phone numbers, to text messages, emails, login information, GPS location data, photos and notes pertaining to the criminal activities associated with their prostitution business.

11. The cell phone retrieved from DANIELS was subsequently searched incident to DANIELS' arrest, and revealed text messages indicative of commercial sex trafficking between his phone, and the phone retrieved in room 108 incident to the arrest of TB. One of these text messages on DANIELS' phone included the text seen on TB's phone which stated, "He is going to stay." Following the administration of his Advice of Rights, an attempt to interview DANIELS at the FBI office located at 1 Justice Park, Houston, TX 77092, by SA Theo Williams and your Affiant, resulted in DANIELS acknowledgement that the telephone taken from him at the time he was placed into custody belonged to him, and was assigned the telephone number (832) 466-3353. In addition to the observance of the aforementioned text messages, the search of DANIELS cell phone also revealed that the phone contained a recorded video of TB and DANIELS engaging in sexual intercourse. Both TB and DANIELS are identifiable in the video as a result of tattoos possessed by each one.

12. Based upon the information delineated above, I believe that probable cause exists for the issuance of a Criminal Complaint charging CHANDOS M. DANIELS with a violation of 18 U.S.C. §1591(a) - Sex trafficking of a minor.



Shanna G. Daniels
Special Agent, FBI

Subscribed and sworn before me this 23rd of June 2014, and I find probable cause.



MARY MILLOY,
United States Magistrate Judge